

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Bankruptcy No. 20-21316-GLT
: :
HEIDI E BLAKE : Chapter 7
: :
Debtor : :
: :
Natalie Lutz Cardiello, Trustee : :
: :
Movant : :
: :
v. : :
: :
No Respondent(s) : :

**APPLICATION TO APPOINT AN
ATTORNEY FOR THE TRUSTEE**

AND NOW, comes Natalie Lutz Cardiello, Trustee for the estate of the above named Debtor, and files this Application to Appoint an Attorney for the Trustee, stating in support thereof as follows:

1. This case was commenced by the filing of a voluntary petition on April 22, 2020.
2. Natalie Lutz Cardiello was appointed as Trustee and has been so serving.
3. This Court has jurisdiction pursuant to 28 U.S.C. Section 1334.
4. This is a core proceeding within the meaning of 28 U.S.C. Section 157.
5. The Trustee requires assistance of counsel to perform various legal duties in connection with

the above captioned estate, including:

- (a) Furnishing information on legal matters in view of possible legal actions;
- (b) Recovering assets through possible legal actions and negotiating in the context of said actions;
- (c) Reviewing and validating claims; and,
- (d) Preparing legal documents and attending hearings.

6. The Trustee believes that it is in the best interest of the estate and its economical administration that she be authorized to appoint the Law Offices of Natalie Lutz Cardiello at a rate of \$350¹ per hour to serve as attorney for the Trustee for the following reasons:

- (a) Attorney Cardiello is admitted to practice before this Court and other necessary State and Federal Courts;
- (b) Attorney Cardiello is experienced in handling these and similar cases; and,
- (c) No member of the staff of Attorney Cardiello is an interested party in this Bankruptcy case.

7. This Honorable Court has power to authorize said employment pursuant to 11 U.S.C. §327(d).

WHEREFORE, Applicant prays that she be authorized to appoint her law firm as Attorney for the Trustee, with compensation for said legal services to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Dated: May 18, 2020

Respectfully submitted,

/s/Natalie Lutz Cardiello
Natalie Lutz Cardiello, Trustee
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¹ Counsel's hourly rate is subject to increase from time to time.